

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

FULL CIRCLE UNITED, LLC,

Plaintiff,

-against-

BAY TEK ENTERTAINMENT, INC.,

Defendant.

Case No: 20 Civ. 3395 (BMC)

BAY TEK ENTERTAINMENT, INC.,

Counterclaim-Plaintiff,

-against-

FULL CIRCLE UNITED, LLC, and ERIC PAVONY,

Counterclaim-Defendants.

**REPLY DECLARATION OF
ROBERT GLUNT**

I, ROBERT GLUNT declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an attorney at Mandel Bhandari LLP, counsel for Plaintiff Full Circle United, LLC.
2. I submit this declaration in further support of Plaintiff's Motions *in Limine*. I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently hereto.
3. For the Court's convenience and to avoid unnecessary complication, this declaration includes the three exhibits submitted in my prior declaration in addition to the exhibits attached in support of Plaintiff's Reply papers.

4. Attached hereto as Exhibit A is a true and accurate copy of the transcript of the February 7, 2025 Pretrial Conference in this action.

5. Attached hereto as Exhibit B is a true and accurate copy of excerpts of the June 14, 2022 deposition of Eric Pavony.

6. Attached hereto as Exhibit C are true and accurate copies of excerpts of certain depositions in this action.

7. Attached hereto as Exhibit D are true and accurate copies of excerpts of the July 12, 2022 deposition of Larry Treankler in this action.

8. Attached hereto as Exhibit E are true and accurate copies of Defendant Bay Tek's Rule 26(a) Initial Disclosures in this action.

9. Attached hereto as Exhibit F are true and accurate copies of excerpts of certain depositions in this action in which Defendant or its counsel describes Skee-Ball® as a game.

10. Attached hereto as Exhibit G is a true and accurate copy of the Settlement Agreement between SBI and FCU that both sides have designated as an exhibit in this action.

11. I respectfully request that the Court grant Plaintiff's motions *in limine*.

Dated: March 21, 2025
New York New York

/s/ Robert Glunt
Robert Glunt